From: Ontario Energy Board <webmaster@oeb.ca>

Sent: Thursday, October 9, 2025 8:30 AM **To:** Office of the Registrar < Registrar@oeb.ca>

Cc: tross@dsel.ca

Subject: Intervention Form: EB-2025-0254 - Tyler Ross

Intervention Form

Case Number:

EB-2025-0254

Requesting information on behalf:

Of an organization

Intervenor Name:

Tyler Ross

Mandate and Objectives:

We feel Wasaga Distribution provides the best opportunity to distribute power to our new development. They are servicing the adjacent subdivision, and we believe this offers the best chance for increased reliability.

Membership of the Intervenor and Constituency Represented:

Primot - Land Developers David Schaeffer Engineering Ltd - Consultant

Programs or Activities Carried Out by the Intervenor:

The existing land is being developed into a residential development.

Governance Structure:

Tyler Ross will be the main point of contact for the OEB throughout the process.

Representatives:

Daniel Stummer daniel@primont.com 9057707002 x 846

Tyler Ross tross@dsel.com 8073550030

Cost Claim Filing contact:

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Oth	er	CON	เาล	cts:

Frequent Intervenor Form:

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

N/A

Names and email addresses of individuals to be added as contacts for this proceeding:

N/A

OEB Proceedings:

Item Description	Category	Status
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111111	Electricity – Rates	Granted
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Issues:

We are largly impacted by the proceedings as we will be working with the servicing LDC on getting the site energized. It is a substantial investment for Primont, with costs ranging from \$3.7M to \$4.2M.

Policy Interests:

Wasaga is offering lower construction costs than HONI and more flexibility in the design process.

Hearings:

If required, please reach out to Tyler at any time. We are unsure which style of hearing would be best or if a hearing is required in the process.

Evidence:

Below is a portion of an email Tyler sent to Daniel earlier this year: Service Territory Dispute The land was previously in WDI territory, but was being fed from HONI's system. WDI & HONI had an arrangement in place where HONI would charge WDI for the usage, who would then charge the land owner. Around a decade ago, the OEB opted to remove this clause and give all of these lands across the Province to the servicing LDC and not the geographical LDC. This resulted in the service territories being amended, and the land was moved to HONI territory, and they became a HONI customer. WDI's stance is that since this land is now being developed, it should be brought back into WDI territory, so it can be incorporated into the surrounding electrical distribution system. In contrast, if it remains with HONI, this subdivision will be isolated electrically. HONI's stance is that this land is currently in their territory, and they feel they will be able to service this land more cost-effectively than WDI (inconclusive) and therefore should stay with them. On this issue, I align more with WDI. That

being said, we can use this situation to our advantage now if we opt to support HONI. Reliability With the information we have, WDI can provide a more reliable system than HONI, although neither is perfect. WDI advised (I have not seen anything to confirm this, but I do not expect they would mislead us) that it has the capabilities to shift the entire load in this area to a different circuit (upstream in the system) in the event something happens to the circuit on which the development is proposed. Additionally, since the surrounding area is all WDI, in the event they ever did extend a second circuit in the area in the future, the development could become significantly more reliable by being able to switch between Circuit A and Circuit B locally at their discretion. The design used in the cost estimate by WDI included two switchgears to provision for this possibility (more on the costs below). HONI has an 8kV and 44kV system on County Road 7. 44kV is not usable for subdivisions, so the 8kV system is the same voltage WDI would be using. We are unsure if HONI can switch the load to a different circuit should there be an issue with the 8kV system, but it would be safe to assume no at this time until we discover otherwise. However, locally within the subdivision itself, both the HONI and WDI designs effectively have the same reliability as they both have a single 8kV circuit as the point of supply. For reliability, I believe WDI has an advantage because they can switch the load for the entire area to a different circuit. Additionally, they are more invested in the area and are much more likely to complete future reinforcements. Preliminary Designs Both preliminary designs are viable options as they will both work. WDI has proposed switchgears with 600A internal to the site. The balancing between the two 200A circuits can be improved, but at a high level, the concept makes sense and aligns with typical industry practice. As stated above, if WDI can access a second 600A circuit (and there potentially could be a second 600A circuit in the adjacent subdivision – we need to confirm), then this design would be much more reliable. The HONI design uses two 4-way 200A kiosks (also known as junctions) to service the site. We typically avoid using junctions in this type of permanent arrangement, but this is one of the situations since there will be no further expansion directly adjacent to the site, where this type of arrangement can work. There is not much HONI could reasonably do in the future to increase the reliability of the design. From an external works perspective, HONI will have to build a pole line in the north boulevard (likely ten poles) to service the site. There would be a pole line in both boulevards of Morgan. WDI will also have to rebuild their existing line. The preliminary plan shows it on the north boulevard, and this section requires ten poles. Since WDI is rebuilding the pole line, there will be some savings as the existing pole line is near the end of its life (in excess of 55 years old), so 100% of the costs will not fall on the developer. From a developer's perspective, both designs use two larger above-grade pieces of equipment to service the site. Both the gears and the junctions will have to be placed on easement, and very likely on the parks. Given the voltage, there is no way around this. From a preliminary design perspective, I believe WDI's philosophy is superior to HONI's, although both are effective. One advantage is that WDI will allow us to complete the design, and HONI will complete it in-house, so with WDI, the design process and utility coordination aspect will be streamlined. Costs Speaking to both WDI and HONI, we confirmed that both estimates included the same general items. At a high-level, the OTC costs include all the supply and installation of transformers, switching units (gears and kiosks), cables, terminations, and connection to the electrical distribution system. The civil works, which include trenching, ducts, and foundations, are in addition to the OTC. WDI provided an estimate for that work, where Tatham Engineering provided an estimate for HONI's portion. See a summary below: OTC Civil Total WDI \$2.17M \$1.52M \$3.69M HONI \$2.56M \$1.64M \$4.20M The civil works being in the same ballpark does simplify this, as we can effectively ignore them. Those costs are going to be whatever they end up being, and there is no significant difference between HONI and WDI from a civil perspective. The cost savings for the external works are likely the contributing factor in driving WDI's OTC down. The

WDI design included more expensive infrastructure with the feeder cable, so it is promising that they are lower with the OTC.

Coordination with Other Intervenors:

There are no other land developers in the area - I am not sure if there are any other parties to coordinate with.

Cost Awards:

No we will not be seeking cost award.

Language Preference:

English